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7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE TERRITORY OF GUAM
9

10 UNITED STATES OF AMERICA,
11 Plaintiff,

12 vs.

13 MELVIN JOHN SALAS NAPUTI,
14 Defendant.

CRIMINAL CASE NO. 10-00068
CRIMINAL CASE NO. 10-00076

**RULE 35 MOTION TO
REDUCE SENTENCE**

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16 The United States of America moves pursuant to Federal Rule of Criminal Procedure
17 35(b)(2)(C) for a reduction of sentence for 12 months for the substantial cooperation provided by
18 Defendant Melvin John Salas Naputi in the trial of United States v. Mateo B. Sardoma, Jr., et.
19 al., CR12-00010.

20 Upon the Government's motion made more than one year after sentencing the court may
21 reduce a sentence if the defendant's substantial assistance involved information the usefulness of
22 which could not reasonably have been anticipated by the defendant until more than one year after
23 sentencing and which was promptly provided to the government after its usefulness was
24 reasonably apparent to the defendant. FRCP 35(b)(2)(C).

1 Defendant Naputi was sentenced on August 8, 2011. He was sentenced to 10 years
2 incarceration in both cases, to run concurrently.

3 Defendant Naputi, twice travelled to Guam from the federal prison to give testimony
4 about drug trafficking on Guam. On February 8, 2012, Defendant Naputi was put before the
5 federal grand jury and provided valuable and useful information regarding Mateo Sardoma and
6 his drug organization, involving how he was receiving his methamphetamine and how he was
7 distributing it.

8 On February 15, 2012, Mateo B. Sardoma, Jr., Rudy Sablan, and Maria Edrosa were indicted
9 by the Federal Grand Jury in Criminal Case No. 12-00010 and trial commenced on June 11,
10 2013. Defendant Naputi testified in that trial as to events he witnessed involving drug trafficking
11 and firearms concerning the Sardoma methamphetamine criminal enterprise. The testimony of
12 Defendant Naputi was helpful, credible and corroborated by other witness testimonies. On
13 October 29, 2013, the jury returned with guilty verdicts for Sardoma, Sablan and Edrosa for
14 felony drug and firearm charges.

15 In testifying about the activities of dangerous drug offenders, Defendant Naputi took the
16 same risk that numerous other defendant witnesses did. The Government requested the
17 cooperation of Defendant Naputi and he provided it. His testimony came way after his own
18 sentencing on August 8, 2011. Never-the-less, his testimony was timely and useful in convicting
19 the leader of Guam's largest drug trafficking organization in the years 2010 to 2012.

20 In testifying about this drug organization, Defendant Naputi rendered a valuable public
21 service and helped to terminate a drug organization that had caused tremendous destruction on

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1 Guam. His truthful cooperation also demonstrated a positive step forward towards his own
2 rehabilitation. Defendant Naputi should be rewarded for his cooperation by a lessened sentence
3 of 12 months.

4 Respectfully submitted this 12th day of November, 2014.

5 ALICIA A.G. LIMTIACO
6 United States Attorney
Districts of Guam and NMI

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8 By: /s/ Frederick A. Black
FREDERICK A. BLACK
9 Assistant U.S. Attorney
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